

REMARKS

Claims 68-84 were pending in the application at the time the present Office Action was mailed. Claim 84 has been amended to correct its dependency. No claims have been added or cancelled. Accordingly, claims 68-84 remain pending in the present application.

In the present Office Action, claim 84 was objected to and claims 68-84 were rejected. More specifically, the status of the claims in view of the present Office Action is as follows:

- (A) Claim 84 was objected to as being of improper dependent form;
- (B) Claims 68, 69, 75 and 84 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,778,693 to Jones et al. ("Jones");
- (C) Claims 70 and 71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of U.S. Patent No. 5,321,242 to Heath ("Heath");
- (D) Claims 72-74 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of U.S. Patent No. 3,048,251 to Bower ("Bower");
- (E) Claim 76 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of U.S. Patent No. 4,836,352 to Tateno et al. ("Tateno") and further in view of U.S. Patent No. 5,745,706 to Wolfberg et al. ("Wolfberg");
- (F) Claims 77-80 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Tateno, in view of Wolfberg, and further in view of U.S. Patent No. 5,936,541 to Stambler ("Stambler"); and
- (G) Claims 81-83 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Tateno and Bower.

A. Response to the Objection to Claim 84

Claim 84 was objected to as being of improper dependent form. More specifically, claim 84 was objected to as being a duplicate of claim 75. Claim 84 has been amended to depend from base claim 76 instead of base claim 68. Accordingly, claim 84 is no longer a duplicate of claim 75 and the objection to claim 84 should be withdrawn.

B. Response to the Section 102 Rejection of Claims 68, 69, 75 and 84

Claims 68, 69, 75 and 84 were rejected under 35 U.S.C. § 102(e) as being anticipated by Jones. Claims 69 and 75 depend from base claim 68, while claim 84 has been amended to depend from base claim 76. As discussed in more detail below, Jones cannot support a proper Section 102 rejection of base claim 68 for at least the reason that this reference fails to teach or suggest the coin sensor of claim 68. More specifically, the Jones reference fails to teach or suggest a coin sensor having *a magnetic core defining a gap* through which coins move.

1. Claim 68 Is Directed to a Coin Counting Machine That Includes, *Inter Alia*, a Coin Sensor Having a Magnetic Core

Independent Claim 68 is directed to a coin counting machine that includes, *inter alia*, a coin input region and a coin sensor configured to discriminate between acceptable and unacceptable coins. The coin sensor includes *a magnetic core defining a gap* through which a portion of the coins from the coin input region move.

2. Jones Discloses a Coin Sensor with a Non-Magnetic Core

Jones teaches a currency processing system having a disk-type coin sorter. As illustrated in Figure 61, the disk-type coin sorter includes a plurality of coin sensors D1-D6 positioned adjacent to corresponding coin slots 1527-1532. The coin sensor D1-D6 is shown in section view in Figure 64 of Jones. As this Figure shows, the coin sensor 1710 includes an excitation coil 1712 that surrounds *a ceramic core 1748*. As Jones states:

"... the excitation coil utilizes a cylindrical ceramic (e.g., alumina) core 17[4]8. Alumina has the advantages of being impervious to humidity and providing a good wear surface. It is desirable that the core 1748 be able to withstand wear because it may come into frictional contact with the coin 1714. Alumina withstands frictional contact well because of its high degree of hardness, i.e., approximately 9 on Mohs scale." (Jones at col. 76; lines 8-16; emphasis added).

3. Jones Cannot Support a Proper Section 102 Rejection of Independent Claim 68 for at Least the Reason That This Reference Fails to Teach or Suggest a Coin Sensor Having a Magnetic Core Defining a Gap Through Which Coins Move

The coin counting machine of independent claim 68 calls for a coin sensor with a magnetic core. Jones fails to teach or suggest this feature. In fact, Jones teaches away from this feature by teaching a coin sensor with a *non-magnetic* core. More specifically, Jones teaches a coin sensor with a ceramic core 1748. (See Figure 64 of Jones, and column 76 at lines 8-16). The only portion of the Jones coin sensor 1710 that is magnetic is the magnetic shield 1744. In contrast to being a "core," however, Jones explicitly teaches that the magnetic shield 1744 is a "shield" that extends around the outside of the ceramic core 1748 and the excitation coil 1712. Therefore, the magnetic shield 1744 cannot reasonably be construed as a "magnetic core." Accordingly, Jones cannot support a proper Section 103 rejection of claim 68 for at least the reason that this reference fails to teach or suggest a coin sensor with a magnetic core. Therefore, the rejection of claim 68 should be withdrawn

Not only does Jones fail to teach or suggest a coin sensor with a magnetic core, but this reference also fails to teach or suggest a coin sensor having a magnetic core that *defines a gap* through which coins move. (In contrast, however, the present application does illustrate such a coin sensor in, among other places, Figure 2C.) Figures 63 and 64 of Jones clearly illustrate that the coin sensor 1710 does not define the gap through which the coin 1714 moves. To the contrary, this gap is defined by the relative positioning of the sorting head 1512 and the resilient pad 1516. As Jones states:

"The top surface of the resilient pad 1516 is preferably spaced from the lower surface of the sorting head 1512 by a gap of about .005 inches (0.13mm). The gap is set around the circumference of the sorting head 1512 by a three-point mounting arrangement including a pair of rear pivots 1518, 1519 loaded by respective torsion springs 1520 which tend to elevate the forward portion of the sorting head." (Jones at column 69; lines 60-67).

Perhaps even more to the point, claim 68 requires that a *magnetic core* define the gap through which the coins move. As set forth above, however, all Jones teaches is a *non-magnetic* core. Therefore, even if the non-magnetic core 1748 of Jones could be construed as defining a gap through which coins move, this still would not anticipate claim 68 because it would not be a magnetic core that defines the gap. Accordingly, Jones cannot support a proper Section 103 rejection of claim 68 for at least this reason and the rejection should be withdrawn.

Claims 69 and 75 depend from base claim 68. Accordingly, Jones cannot support a Section 102 rejection of dependent claims 69 and 75 for at least the reason that this reference cannot support a Section 102 rejection of base claim 68, and for the additional features of these dependent claims. Therefore, the rejection of dependent claims 69 and 75 should also be withdrawn.

The rejection of dependent claim 75 should be withdrawn for at least one additional reason. Claim 75 states that the coins from the coin input region of the coin counting machine *roll* through the gap defined by the coin sensor. Nowhere does Jones teach or suggest rolling coins through a gap defined by a coin sensor. In contrast, the Jones reference explicitly teaches that the coins "slide" past the coin sensor 1710 as illustrated in Figure 64 of Jones and as stated in column 70 at lines 11-22:

"as the disk 1513 is rotated, **the coins 1525 deposited on the top surface thereof tend to slide** outwardly over the surface of the pad due to centrifical force. . . . as the coins move outwardly, **those coins which are lying flat** on the pad enter

the gap between the pad surface and the guide plate 1512 because the underside of the inner periphery of this plate is spaced above the pad 16 by a distance which is about the same as the thickness of the thickest coin." (Jones at column 70; lines 11-22; emphasis added.)

Thus, as this passage and Figures 61-64 make clear, the coins of the Jones reference are "lying flat" and "slide" past the coin sensor because the gap between the pad surface and the guide plate is about the "same as the thickness of the thickest coin." Coins that are lying flat and sliding cannot reasonably be construed as rolling, as called for dependent claim 75. Accordingly, the rejection of claim 75 should be withdrawn for this additional reason.

Claim 84 is similar to claim 75, but depends from base claim 76. Claim 84 distinguishes over the applied Jones reference for the reasons stated above relating to claim 75. Therefore, the rejection of claim 84 should also be withdrawn.

C. Response to the Section 103 Rejection of Claims 70 and 71

Dependent claims 70 and 71 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Heath. Claims 70 and 71 depend from base claim 68. For the reasons discussed above, Jones cannot support a Section 102 or Section 103 rejection of base claim 68 for at least the reason that Jones fails to teach or suggest the coin sensor of base claim 68. Further, Heath fails to cure this deficiency of Jones. Accordingly, the combination of Jones and Heath cannot support a Section 103 rejection of dependent claims 70 and 71 for at least the reason that these references cannot support a Section 103 rejection of corresponding base claim 68, and for the additional features of these dependent claims. Therefore, the rejections of claims 70 and 71 should be withdrawn.

D. Response to the Section 103 Rejection of Claims 72-74

Claims 72-74 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Bower. Claims 72-74 depend from base claim 68. For the reasons discussed in detail above, Jones cannot support a Section 102 or Section 103 rejection of base claim 68. Further, Bower fails to cure the deficiencies of the Jones reference. Accordingly, the combination of Jones and Bower cannot support a proper Section 103 rejection of dependent claims 72-74 for at least the reason that these references cannot support a proper Section 103 rejection of corresponding base claim 68, and for the additional features of these dependent claims. Therefore, the rejections of dependent claims 72-74 should be withdrawn.

The rejection of dependent claim 74 should be withdrawn for at least one additional reason. Dependent claim 74 is directed to the coin counting machine of claim 68, and further includes a movable coin cleaning device configured to receive a portion of the coins from the coin input region. In claim 74, the movable coin cleaning device has a "rectangular cross-section." In contrast, the Bower reference teaches a coin "unscrambler 11" having a *cylindrical* drum 16. (See, e.g., Figures 1 and 2 of Bower and columns 1 and 2 at lines 70-30). Nowhere does Bower teach or suggest that the cylindrical drum 16 can have a "rectangular cross-section." Accordingly, the combination of Jones and Bower cannot support a proper Section 103 rejection of dependent claim 74 for at least this additional reason, and the rejection should be withdrawn.

E. Response to the Section 103 Rejection of Claim 76

Independent claim 76 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Tateno and further in view of Wolfberg. Independent claim 76 is directed to a coin counting machine that includes, *inter alia*, a coin input region and a coin sensor configured to discriminate between acceptable and unacceptable coins. The coin sensor includes a *magnetic* core defining a gap through which coins from the coin input region move.

The Office Action relies on Jones to teach the coin sensor of independent claim 76. As explained in detail above, however, Jones fails to teach or suggest a coin sensor having the magnetic core of claim 76. Furthermore, Tateno and Wolfberg fail to cure this deficiency of Jones. Accordingly, the combination of Jones, Tateno, and Wolfberg cannot support a proper Section 103 rejection of independent claim 76 for at least the reason that these references fail to teach or suggest the coin sensor of independent claim 76. Therefore, the rejection of claim 76 should be withdrawn.

The coin counting machine of independent claim 76 further includes a voucher output facility configured to dispense a voucher that is redeemable for a value based on coin data. The Office Action asserts that this voucher feature is taught by the Tateno and/or Wolfberg references. Applicant respectfully disagrees with this assertion. In contrast to a voucher that is redeemable *for a value* related to coin data, Tateno teaches a package collection locker that prints and issues a voucher *for packages* placed in the package collection locker. Nowhere does Tateno teach or suggest that the voucher is "redeemable by the user for the value determined by the processing device," as recited by claim 76. Accordingly, the combination of Jones, Tateno and Wolfberg cannot support a proper Section 103 rejection of independent claim 76 for at least this additional reason, and the rejection should be withdrawn.

Furthermore, the Office Action states "the suggestion/motivation [to combine Tateno with Jones] would have been to issue the deposit or customer a receipt for the currency deposited so that the customer has a record of said deposit." Even accepting this unsupported assertion as true, it would still not render the claimed invention obvious because the voucher of claim 76 does more than simply provide a record. Specifically, the voucher of claim 76 is "redeemable for the value determined by the processing device." Nowhere does Tateno teach or suggest that his voucher is redeemable for any value, much less a value based on coin data. Therefore, the applied references of Jones, Tateno and Wolfberg cannot support a proper Section 103 rejection of independent claim 76 for at least this additional reason, and the rejection should be withdrawn.

F. Response to the Section 103 Rejection of Claims 77-80

Dependent claims 77-80 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Tateno, in view of Wolfberg, and further in view of Stambler. Claims 77-80 depend from base claim 76. Jones cannot support a Section 103 rejection of independent claim 76 for at least the reasons discussed above. Further, Tateno, Wolfberg and/or Stambler fail to cure the deficiencies of Jones with respect to base claim 76. Accordingly, the combination of Jones, Tateno, Wolfberg and/or Stambler cannot support a proper Section 103 rejection of dependent claims 77-80 for at least the reason that these references cannot support a proper Section 103 rejection of corresponding base claim 76, and for the additional features of these dependent claims. Therefore, the rejections of dependent claims 77-80 should be withdrawn.

G. Response to the Section 103 Rejection of Claims 81-83

Dependent claims 81-83 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jones in view of Tateno and Bower. Claims 81-83 depend from base claim 76. Jones cannot support a proper Section 103 rejection of base claim 76 for at least the reasons discussed in detail above. Further, the Tateno and Bower references fail to cure the deficiencies of Jones. Therefore, the combination of Jones, Tateno and Bower cannot support a Section 103 rejection of claims 81-83 for at least the reason that these references cannot support a proper Section 103 rejection of base claim 76, and for the additional features of these dependent claims. Therefore, the rejections of dependent claims 81-83 should be withdrawn.

The rejection of dependent claim 83 should be withdrawn for at least one additional reason. Dependent claim 83 recites that the movable coin cleaning device has "a rectangular cross-section." As discussed in detail above with regard to dependent claim 74, none of the applied references teach or suggest a coin cleaning device having "a rectangular cross-section." Therefore, the rejection of dependent claim 83 should be withdrawn for at least this additional reason.

In view of the above response, applicants believe the pending application is in condition for immediate allowance. Applicant further believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 50-0665, under Order No. 213828003US10 from which the undersigned is authorized to draw.

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Respectfully submitted,

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